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Attorney for Defendant Portfolio
Recovery Associates, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

GLENN CAREY,

Plaintiff,

v.

PORTFOLIO RECOVERY
ASSOCIATES, LLC,

Defendant.

Case No. 1:12-cv-1838

UNOPPOSED MOTION TO EXTEND
DEADLINE TO FILE RESPONSIVE
PLEADING

CERTIFICATION

Pursuant to Local Rule 7.1(a), counsel for defendant Portfolio Recovery Associates, LLC (“PRA”) certifies that he has conferred with plaintiff’s counsel, who does not oppose this motion.

MOTION

Defendant PRA respectfully moves this Court for an extension of time to file an Answer or other Responsive Pleading until December 11, 2012, an additional two weeks. This is defendant’s second request for an extension.

The undersigned counsel is continuing to investigate the claims made in the complaint and needs additional time to prepare an appropriate responsive pleading. In addition, counsel for Page 1 – MOTION TO EXTEND DEADLINE
TO FILE ANSWER OR OTHER
RESPONSIVE PLEADING

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plaintiff and for defendant have engaged in some limited settlement negotiations and would like to speak again before further pleadings are filed. Plaintiff would suffer no prejudice by allowing the defendant this short extension.

This motion is filed in good faith and not for the purpose of delay.

CONCLUSION

The court should extend the deadline by which to file an Answer or other Responsive Pleading to December 11, 2012, two weeks from today.

DATED this 27th of November, 2012.

HINSHAW & CULBERTSON LLP

/s David J. Elkanich

David J. Elkanich, OSB No. 992558
Attorney for Defendant Portfolio
Recovery Associates, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2012, I caused to be electronically filed with the Clerk of the Court through the CM/ECF system, the document **MOTION TO EXTEND DEADLINE TO FILE ANSWER OR OTHER RESPONSIVE PLEADING**, which will send notification of such filing(s) to the following:

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Counsel for Plaintiff

DATED this 27th day of November, 2012.

HINSHAW & CULBERTSON LLP

/s David J. Elkanich

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